

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**

MARCELIN LIBERAL, individually, and on  
behalf of all others similarly situated,

Plaintiff,

v.

HEALTHCARE REVENUE RECOVERY  
GROUP, LLC and MEMORIAL REGIONAL  
HOSPITAL SOUTH AUXILIARY, INC.,

Defendants.

Case No. 0:22-cv-60450-RS

**PLAINTIFF'S TRIAL WITNESS LIST**

Plaintiff, MARCELIN LIBERAL ("Plaintiff"), hereby submits Plaintiff's Trial Witness

List as follows:

1. Plaintiff will provide testimony as to the facts that give rise to his claims and his damages.

Contact Information:

Plaintiff may be contacted through his undersigned counsel.

2. Corporate Representative for Healthcare Revenue Recovery Group, LLC ("HRRG") is expected to provide testimony on (1) communications between HRRG and Plaintiff; (2) communications between HRRG and Memorial Regional Hospital South Auxiliary, Inc. ("MRSH") regarding the alleged debt(s) owed by Plaintiff; (3) the collection calls placed by HRRG to Plaintiff's cellular phone; (4) the technology HRRG employed to place the collection calls; (5) the identities of any third parties that may have placed calls on behalf of HRRG to Plaintiff's cellular phone; (6) the collection calls placed to the putative class members; and (7) the identities of the putative class members.

Contact Information:

HRRG may be contacted through its counsel of record.

3. Corporate Representative for Memorial Regional Hospital South Auxiliary, Inc. (“MRH”) is expected to provide testimony on (1) the medical services it allegedly provided Plaintiff that gave rise to the debt(s) allegedly owed by Plaintiff; (2) the placement of the alleged debt(s) with HRRG for collection; and (3) communications between MRH and HRRG.

Contact Information:

3600 Washington St.  
Hollywood, Fla 33021  
(954) 966-4500

4. Corporate Representative for T-Mobile US, Inc. (“T-Mobile”) is expected to provide testimony on its business records for Claimant’s phone number, including HRRG’s phone calls to Plaintiff.

Contact Information:

3625 132<sup>nd</sup> Ave. SE  
Bellevue, WA 98006  
(877) 413-5903

Dated: November 18, 2022

Respectfully Submitted,

/s/ Alexander J. Taylor  
Alexander J. Taylor  
SULAIMAN LAW GROUP, LTD.  
2500 South Highland Avenue  
Suite 200  
Lombard, Illinois 60148  
(630) 575-8180  
ataylor@sulaimanlaw.com

**CERTIFICATE OF SERVICE**

I, Alexander J. Taylor, certify that on November 18, 2022, I caused the foregoing **Plaintiff's Trial Witness List** to be served upon counsel of record, as listed below, via email.

**Ernest H. Kohlmyer, III**  
Email: SKohlmyer@Shepardfirm.com  
*Counsel for Defendant*

/s/ Alexander J. Taylor